

BOIES SCHILLER FLEXNER LLP
 RICHARD J. POCKER (NV Bar No. 3568)
 300 South Fourth Street, Suite 800
 Las Vegas, NV 89101
 Telephone: 702.382.7300
 Facsimile: 702.382.2755
 rpocker@bsflp.com

PAUL, WEISS, RIFKIND, WHARTON &
 GARRISON LLP
 WILLIAM A. ISAACSON (*pro hac vice*)
 KAREN DUNN (*pro hac vice*)
 2001 K Street, NW
 Washington, DC 20006
 Telephone: 202.223.7300
 Facsimile: 202.223.7420
 wisaacson@paulweiss.com
 kdunn@paulweiss.com

BOIES SCHILLER FLEXNER LLP
 BEKO O. REBLITZ-RICHARDSON (*pro hac vice*)
 SEAN P. RODRIGUEZ (*pro hac vice*)
 44 Montgomery Street, 41st Floor
 San Francisco, CA 94104
 Telephone: 415.293.6800
 Facsimile: 415.293.6899
 srodriguez@bsflp.com

MORGAN, LEWIS & BOCKIUS LLP
 BENJAMIN P. SMITH (*pro hac vice*)
 JOHN A. POLITO (*pro hac vice*)
 SHARON R. SMITH (*pro hac vice*)
 One Market, Spear Street Tower
 San Francisco, CA 94105
 Telephone: 415.442.1000
 Facsimile: 415.442.1001
 benjamin.smith@morganlewis.com
 john.polito@morganlewis.com
 sharon.smith@morganlewis.com

DORIAN DALEY (*pro hac vice*)
 DEBORAH K. MILLER (*pro hac vice*)
 JAMES C. MAROULIS (*pro hac vice*)
 ORACLE CORPORATION
 500 Oracle Parkway, M/S 5op7
 Redwood City, CA 94070
 Telephone: 650.506.4846
 Facsimile: 650.506.7114
 dorian.daley@oracle.com
 deborah.miller@oracle.com
 jim.maroulis@oracle.com

*Attorneys for Plaintiffs Oracle USA, Inc.,
 Oracle America, Inc., and Oracle
 International Corp.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC.; a Colorado corporation;
 ORACLE AMERICA, INC.; a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 and SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-VCF

**DECLARATION OF JOHN A.
 POLITO REGARDING RIMINI
 STREET, INC. AND SETH
 RAVIN'S MOTION TO SEAL
 PORTIONS OF RIMINI'S
 OPPOSITION TO ORACLE'S
 MOTION FOR ORDER TO SHOW
 CAUSE AND SUPPORTING
 DOCUMENTS (ECF NO. 1384)**

1 I, John A. Polito, declare as follows:

2 1. I am an attorney admitted to practice *pro hac vice* before this Court in the above
3 captioned matter, and a Partner at Morgan, Lewis & Bockius LLP, counsel of record in this action
4 for Plaintiffs Oracle America, Inc. and Oracle International Corp. (collectively, "Oracle"). I have
5 personal knowledge of the facts set forth in this declaration and would competently testify to
6 them if called upon to do so.

7 2. I submit this declaration in support of Oracle's Memorandum of Points and
8 Authorities Regarding Rimini Street, Inc.'s and Seth Ravin's Motion to Seal Portions of Rimini's
9 Opposition to Oracle's Motion for Order to Show Cause ("Rimini's Opposition") and Supporting
10 Documents (ECF No. 1384).

11 3. I have reviewed Rimini's Opposition along with all supporting declarations and
12 exhibits. The materials set forth below each contain (in whole or at least in part) non-public,
13 technologically, or commercially sensitive information relating to Oracle's technology and
14 software products. Oracle therefore requests sealing of the materials described below.

15 4. The Declaration of Owen A. Astrachan ("Astrachan Declaration") was submitted
16 to the Court in connection with Rimini Street, Inc.'s and Seth Ravin's Opposition (ECF No.
17 1382-1).

18 5. Exhibit A to the Astrachan Declaration comprises excerpted portions of the
19 Rebuttal Expert Report of Owen A. Astrachan. Portions of this exhibit (including at page ii;
20 paragraphs 178-79, 183, 186-88, 190, 192, 195, 197-200, 202-06, 208, 214-16, 218, 269, 297-98,
21 328-29; headings VII.2.3 and VII.2.4; and, footnotes 161 and 172) contain non-public,
22 technologically or commercially sensitive information relating to Oracle source code files.

23 6. Exhibit B to the Astrachan Declaration comprises excerpted portions of the
24 Supplemental Expert Report of Owen A. Astrachan. Portions of this exhibit (including
25 paragraphs 10-11, 18-19, 21-22, 27-28, 37, 54, and footnote 15) contain non-public,
26 technologically or commercially sensitive information relating to Oracle source code files.

27 7. The Declaration of Stephen A. Lanchak was submitted to the Court in connection
28 with Rimini Street, Inc.'s and Seth Ravin's Opposition (ECF No. 1382-2). Exhibit C to the

1 Lanchak Declaration comprises excerpted portions of the Supplemental Expert Report of Stephen
 2 A. Lanchak. Portions of this exhibit (including paragraphs 51, 61, and 82, and footnotes 54 and
 3 75) contain non-public, technologically or commercially sensitive information relating to Oracle
 4 source code files and license agreements.

5 8. The Declaration of Craig Mackereth was submitted to the Court in connection with
 6 Rimini Street, Inc.'s and Seth Ravin's Opposition (ECF No. 1382-3). Exhibit I to the Mackereth
 7 Declaration comprises excerpts from a March 27, 2019 email sent by Arijit Ray bearing the Bates
 8 number RSI007285466. Portions of this exhibit contain non-public, technologically or
 9 commercially sensitive information relating to Oracle source code files.

10 9. The Declaration of Eric Vandeveld was submitted to the Court in connection with
 11 Rimini Street, Inc.'s and Seth Ravin's Opposition (ECF No. 1382-4). Exhibit O to the
 12 Vandeveld Declaration comprises excerpts from the June 19, 2020 deposition of Barbara
 13 Frederiksen-Cross. Portions of this exhibit (including at 161:16) contain non-public,
 14 technologically or commercially sensitive information relating to Oracle source code files.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
 16 true and correct.

17 Executed August 14, 2020 at Berkeley, California.

18
 19 DATED: August 14, 2020

MORGAN, LEWIS & BOCKIUS LLP

20 By: /s/ John A. Polito

21 John A. Polito

22 Attorneys for Plaintiffs Oracle USA, Inc.,
 23 Oracle America, Inc., and Oracle
 24 International Corporation
 25
 26
 27
 28

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of August, 2020, I electronically transmitted the foregoing DECLARATION OF JOHN A. POLITO REGARDING RIMINI STREET, INC. AND SETH RAVIN'S OPPOSITION TO ORACLE'S MOTION FOR ORDER TO SHOW CAUSE AND SUPPORTING DOCUMENTS to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

DATED: August 14, 2020

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ John A. Polito
John A. Polito

Attorneys for Plaintiffs Oracle USA, Inc.,
Oracle America, Inc., and Oracle
International Corporation